

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

NATIONAL RELIGIOUS BROADCASTERS,  
SAND SPRINGS CHURCH, FIRST BAPTIST  
CHURCH WASKOM, and INTERCESSORS FOR  
AMERICA

Plaintiffs,

v.

DANNY WERFEL, IN HIS OFFICIAL CAPACITY  
AS COMMISSIONER OF  
THE INTERNAL REVENUE SERVICE, and  
THE INTERNAL REVENUE SERVICE

Defendants.

Civil Action No.  
6:24-cv-00311

**PLAINTIFFS' UNOPPOSED MOTION  
TO EXTEND DEADLINE TO RESPOND TO DEFENDANTS'  
MOTION TO DISMISS**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiffs move this Court to enter an Order extending the time for them to file their reply to the United States' Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) for an additional forty-five (45) days. In support, the Plaintiffs would respectfully show that good cause exists for the following reasons:

1. The Complaint in this case was filed on August 28, 2024, and a summons was served on the Internal Revenue Service on September 9, 2024. The original answer was due on November 8, 2024. With the consent of Plaintiffs'

counsel, the United States requested and received an additional 45 days to file its response to the complaint. The new deadline was December 23, 2024, which in total gave the United States 115 days to file this motion to dismiss. The motion was filed on that date.

2. Said motion was made in a 50-page submission to the Court that raises complex legal arguments which must be answered in like fashion. Pursuant to Local Rule CV-7(e), the normal deadline for Plaintiffs to respond would be January 7, 2025. This deadline occurs over the Christmas and New Year's holiday and together with the complexity of the legal arguments requires additional time for Plaintiffs' to properly submit their response.

3. As indicated by the attached Certificate of Conference, undersigned counsel conferred via email with counsel for the United States on December 27, 2024, regarding this Motion and the request for additional time. Counsel for the United States does not oppose this Motion.

4. This motion is the first request for an extension, is unopposed, will not prejudice the parties, and will promote judicial efficiency. Thus, there is good cause to grant the requested extension. *See* Fed. R. Civ. P. 6(b).

WHEREFORE, for the reasons stated above, the Plaintiffs seek an additional 45 days, until February 21, 2025 to file its reply to the Motion of the United States.

Respectfully submitted,

MICHAEL P. FARRIS  
Attorney for Plaintiffs

/s/Michael P. Farris

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF CONFERENCE**

I, Michael Farris, certify that on December 27, 2024, I conferred with counsel for the United States via email, and he indicated that the United States does not oppose the relief sought.

/s/Michael P. Farris

MICHAEL P. FARRIS

**CERTIFICATE OF SERVICE**

I, Michael Farris, certify that on December 30, 2024, I electronically filed this pleading using the ECF system which will send notification to all counsel of record.

/s/Michael P. Farris